

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

RONALD SHAMON and	)	
PATRICIA SHAMON,	)	
	)	
Plaintiffs	)	
	)	Civil Action No. 04-11674-WGY
v.	)	
	)	
UNITED STATES OF AMERICA,	)	
	)	
Defendant.	)	
	)	

**PARTIES' JOINT SCHEDULING STATEMENT**

Pursuant to Local Rule 16.1(D), the plaintiffs, Ronald Shamon and Patricia Shamon, and the defendant, United States of America, respectfully submit this joint statement and proposed pretrial schedule:


1. Initial Disclosures: The parties will make their initial disclosures no later than January 18, 2005.
2. Fact Discovery: Written discovery and depositions of fact witnesses will be completed by May 2, 2005.
3. Expert Discovery:
  - a. Plaintiffs: The Plaintiffs will disclose the identity of their expert witness(es) by June 1, 2005. The Plaintiffs shall serve their expert report(s) pursuant to Rule 26(a)(2)(B) and shall respond to any expert interrogatories on or before July 15, 2005.
  - b. Defendants: The Defendant will disclose identity of its expert witness(es) by July 1, 2005. The Defendant shall serve its expert report(s) pursuant to Rule 26(a)(2)(B) and shall respond to any expert interrogatories by August 15, 2005.
  - c. Expert Depositions: Expert depositions will be completed by September 15, 2005.

4. Dispositive Motions: Dispositive motions shall be filed on or before September 30, 2005.
5. Trial: A trial will be scheduled November 1, 2005.

Respectfully submitted,

RONALD SHAMON, and  
PATRICIA SHAMON,

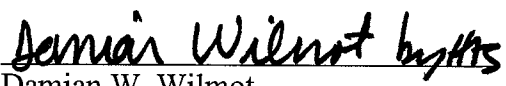
By their attorneys,

  
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UNITED STATES OF AMERICA,

By its attorney,

  
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Dated: December 28, 2004  
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